

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

The Roman Catholic Diocese of
Ogdensburg, New York,

Debtor.

Case No. 23-60507 (PGR)

Chapter 11

The Roman Catholic Diocese of
Ogdensburg, New York, *et al.*,¹

Plaintiffs,

v.

Certain Underwriters at Lloyd's,
London, *et al.*,

Defendants.

Adv. Proc. No. 23-80013

**INA'S REQUEST TO REQUIRE ROGER KRAMER
TO SUBMIT A RULE 2014 STATEMENT AS PART OF HIS CONSIDERATION
FOR APPOINTMENT AS A MEDIATOR**

After the initial submission of mediator candidates, the Committee's counsel suggested a lawyer in Minnesota, Roger Kramer, as a potential mediator in this case. The facts and circumstances of Mr. Kramer's engagements, the extent to which he has been retained by trusts within which he owes a fiduciary duty to abuse claimants and his relationship to Minnesota lawyers involved in this case, are not clear to us. As we understand it, the Diocese has objected to Mr. Kramer's retention per Charles Sullivan's letter to the court filed on November 10, 2023. *See Letter Re: Diocese's Recommendation for Mediator*, Adv. Dkt. No. 55. Hence, we are not of the impression that he is not still being consider. If Mr. Kramer is to be considered, we

¹ The Caption has been abbreviated pursuant to Federal Rule of Civil Procedure 10 and Federal Rule of Bankruptcy Procedure 7010. If you would like to see the full caption in this adversary proceeding, please refer to the Adversary Complaint found at Docket No. 1.

respectfully request that he be required to submit a verified Rule 2014 disclosure statement before a hearing on his retention.

Dated: December 4, 2023

Respectfully submitted,

By: /s/ Tancred Schiavoni

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